



INVESTOR GRIEVANCE REDRESSAL POLICY

The Investor Grievance Redressal Policy (IGR Policy) has been formulated and adopted by BGR Energy Systems Limited.

The Company's Equity Shares are listed on the recognized stock exchanges viz., National Stock Exchange of India Limited (NSE) and BSE Limited (BSE).

The matters related to transfer/ transmission and transposition of securities, etc. of the Company and activities related to the handling of shareholders/ investors grievances and related functions of the Company are performed by the Registrar & Transfer Agent of the Company ("RTA") viz., MUFG Intime India Pvt. Ltd. which is closely monitored by the Company and confirmation in that regard is being obtained from RTA from time to time.

The Board has appointed the Company Secretary to act as the Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). As Compliance Officer, the Company Secretary is responsible for ensuring the provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor grievances.

1. Definition

For the purpose of this Policy, the following words will carry the meaning as under:

- a. "Board" means the Board of Directors of BGR Energy Systems Limited.
- b. "Company" means BGR Energy Systems Limited.
- c. "Stipulated Turnaround Time" means the timelines as specified in the Investor Timelines section of this Policy.

The words and phrases not defined under this Policy will carry the same meaning as defined under the Articles of Association of the Company; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.

2.Objects of the Policy

This Policy is formulated to provide prompt services to the investors and to effectively address and redress their grievances in a timely manner. It also helps build investor confidence by formulating investor grievance redressal mechanisms and to develop friendly relations with the investors.

The Company Should:

- Ensure visibility and accessibility of the complaint handling process to all complainants.
- Provide access to grievance redressal policy to investors on need-to-know basis.
- Handle complaints professionally & in a transparent manner.
- Ensure confidentiality of complainant's information unless required for addressing the complaint.
- Ensure clear accountability for resolution and reporting of complaints.
- Continually improve its processes & systems by taking inputs/ feedback from the investors.

The Company takes pride to address all the queries/ grievances/ concerns brought to its attention by the investors and also classify & differentiate queries, requests and complaints, etc. and accordingly resolve them to the satisfaction of the concerned investors.

3.Grievance Handling and Mechanism

The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). As Compliance Officer, the Company Secretary is responsible for ensuring the provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor grievances.

The Company has engaged RTA for handling and servicing investor queries/ requests and complaints in a timely and efficient manner.

In terms of the policy adopted by the Company, only grievances/ complaints received from regulatory authorities/ stock exchanges relating to the security holders shall be considered for the purpose of reporting to stock exchanges in

accordance with SEBI Listing Regulations.

Some of the important steps followed by the Company for handling investor queries/ grievances are enumerated below:

- The Company has a designated email ID investors@bgrenergy.com for handling investor grievances.
- MUFG Intime India Pvt. Ltd being the Registrars and Transfer Agents (RTA) of the Company is primarily responsible for discharging investor service functions effectively, efficiently and expeditiously.
- Secretarial Department of the Company access the above-mentioned designated investor grievances e-mail ID on a regular basis to ensure timely responses to be given to the investors.
- Status Report is obtained periodically from RTA in respect of various correspondences and complaints received by the Company directly or by Link Intime India Pvt Ltd and the same is being placed before the Board/ Stakeholders Relationship Committee from time to time.
- All the investor complaints/ grievances received through "SEBI Complaints Redress System" (SCORES Portal) are being attended and resolved expeditiously.
- The escalation matrix is being made available for information of the investors.

In terms of the requirements of the Companies Act, 2013 and SEBI Listing Regulations, the Company has constituted the Stakeholders' Relationship Committee (SRC) which inter-alia oversee mechanism followed by the Company for redressal of investor grievances and effective functioning of the same. SRC reviews adherence to the service standards adopted by the Company in respect of services being rendered by RTA, measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants and any other regulatory communication by the shareholders.

4. Investor Service Timeline

The Company and its RTA follow the following timelines for performance of its duties towards investors:

Particulars	TAT#
Dividend related queries	Within 15 Days
Demat related queries	Within 15 Days
Remat requests	Within 30 Days

Allotment/ Refund related	Within 10 Days
Other requests - such as change of address, non-receipt of the annual report and updation of bank details, etc.	Within 30 Days
Scores related	as specified by the regulator from time to time

In case statutory timelines for redressal of any grievance, not specifically mentioned here, have been prescribed, the Company / STA shall address such grievance within the timeline as prescribed under law.

The above TAT can change depending upon the nature and complexity of the complaint.

#General Turn Around Time (TAT) for response to the complaint is (from the receipt of the valid complaint in writing).

Escalation of Complaints:

If an investor is not satisfied with the resolution provided through various channels or the method of handling the complaint; the investor can escalate the issues to the next higher level i.e. to the Managing Director of the Company. Such escalation should be made in writing and should be delivered in the hard copy to the Corporate Office of the Company.

Note:

In case, any supporting documents for addressing the investor request/ query, the said matters shall be addressed within a period of 7 days from the receipt of such documents by RTA/ Company.

In case statutory timelines for redressal of any grievance not specifically prescribed, the Company/ RTA shall address such grievance within the timelines as prescribed under applicable law.

5.Classification of Shareholders Communication

The Company receives various correspondence/ communication from the shareholders/ investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries/ requests by the shareholders.

The Company presently follows a set of guidelines for classifying the shareholders' communication between general correspondence/ requests/ complaints, etc. These guidelines are internal to the Company.

General Principle guiding classification of shareholders' communication

a. Multiple correspondence/communications or reminders received for the same matter within the stipulated turnaround time in this Policy for the handling of the query/communication will be treated as one complaint.

b. If a query is resolved after the stipulated turnaround time and there is no reminder from the shareholder during such time period, the such query will not be treated as a complaint.

c. In case of any ambiguity, the Company Secretary shall be the sole authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.

d. The following communications

Sr. No	Communication is not treated as a complaint	Communication is treated as a complaint
a.	Non-receipt of annual report	
	First request or any such communication w.r.t. non-receipt of the annual report will be considered as a request if, the Company has dispatched the annual report to the shareholder on or before the due date(s) through permissible means. Such communication shall be treated as a request for an additional copy of the annual report. The company shall respond to the request by intimating the original date of dispatch of the annual report and will also share a copy of the annual report in compliance with the shareholder's request.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if, ➔the Company / STA has not dispatched the annual report to the shareholder on or before the due date(s), or ➔the Company / STA has not responded to shareholder's request within the stipulated turnaround time.
b.	Non-receipt of dividend	
	First request or any such communication w.r.t. non-receipt of dividend will be considered as a query / request if, the Company has credited the dividend to the bank account of the shareholder or dispatched dividend warrants / demand drafts on or before the due date(s).	Any communication w.r.t. non-receipt of dividend warrants / demand drafts sent to the Company or to the STA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant will be considered as complaint.

	When the Company is unable to pay out the dividend: →In case where the dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant / demand draft in favour of the shareholder. →In case the dispatched dividend warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the dividend warrant / demand draft only upon a written request by the shareholder. Such communication from the shareholder will be treated as a request and not a complaint.	
c.	Non-receipt of share certificates	
	Non-receipt of duly authenticated share certificate(s) upon sub-division / transfer / transmission / consolidation / re-materialization will be considered as a query if, the Company has dispatched the share certificates within prescribed time limits. The Company shall respond to the query by sharing details of dispatch to the shareholders. It is clarified that upon the dispatch of share certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its duty and the shareholders are expected to coordinate with the postal / courier agency for the share certificates dispatched.	Communication w.r.t. non-receipt of duly authenticated share certificate(s) after the expiry of the statutory period for giving effect to the respective request will be treated as a complaint if, the Company has not dispatched the share certificates to the shareholder

d.	Shareholder communication through statutory authorities	
	Any communication from investors through statutory authorities which: → is not treated as a complaint by the statutory authority, and → which would not have been treated as a complaint by the Company if it was directly addressed to the Company, will not be treated as a complaint. As per SEBI circular dated March 26, 2018, any grievances submitted to SEBI through SCORES will not be treated as complaints if the grievance is redressed by the Company within 30 days. Accordingly, such grievances registered with SEBI, will be not treated as complaints by the Company.	At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a complaint under the guidelines adopted by the Company. However, since the statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the Company is constrained to follow the classification as followed by the statutory authorities. Accordingly, any communication from investors received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which is treated as complaint by such statutory authority, will be treated as a complaint by the Company.
e.	Others	
	I. Correspondence w.r.t. change in address, nominees etc will be considered as a request and not as a complaint if, the request is addressed within the stipulated turnaround time. II. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint. III. Any communication requisitioning information or documents relating to the	Any communication from the investor not responded to by the Company or not responded by the Company within the stipulated turnaround time will be considered as a complaint.

	Company or its operations as per statutory rights available to the shareholders will be treated as request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits. IV. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint. V. Communications / complaints in relation to matters that are subjudice will not be treated as a complaint under this Policy.	
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6.Escalation Matrix

The Company is committed to providing effective and prompt service to its investors. The Company has in place designated e-mail ID for investor servicing and grievance redressal.

However, the primary responsibility of investors servicing and handling of investor requests/ queries/ complaints lies with Link Intime India Pvt. Ltd in the capacity of RTA of the Company.

Investors can refer to the below-given escalation matrix in case they do not receive any revert from RTA/ Company within the timelines specified above.

Level 1	MUFG Intime India Pvt. Ltd (RTA of the Company) Address: C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg Vikhroli (West), Mumbai, Maharashtra, 400083 Tel No: 022 – 49186200 Website: www.linkintime.co.in
Level 2	Secretarial Department of the Company Mr.S.Sundar– Company Secretary & Compliance Officer Email: investors@bgrenergy.com

Level 3	SEBI SCORES In case any of the investors is not satisfied with the response furnished by the Company to his/ her complaint, he/ she may refer it to "SCORES", the centralized online system for lodging and tracking complaints made available by SEBI. SCORES facility can be accessed through the web link https://scores.gov.in

7.Miscellaneous

The Company Secretary is authorized to amend the Policy to give effect to any changes / amendments notified by the Ministry of Corporate Affairs or SEBI. The amended Policy shall be placed before the Stakeholder Relationship Committee for noting and ratification.

This Policy shall be effective from 28th May 2025 and can be modified, withdrawn or suspended by the Company at its sole discretion without any prior intimation.